

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ROWE ENTERTAINMENT, et al.,

Plaintiffs,

-against-

THE WILLIAM MORRIS AGENCY INC., et al.,

Defendants.
-----X

Case No. 98-8272-RPP

~~PROPOSED~~ SUPPLEMENTAL
ORDER FINDING LEONARD
ROWE IN CONTEMPT OF COURT

The Court having entered an Order Finding Leonard Rowe in Contempt of Court dated February 18, 2014 (ECF No. 929) ("Contempt Order"), which Contempt Order found Leonard Rowe ("Rowe") in contempt of Court for, among other things, filing various UCC Financing Statements against current and former attorneys with Dentons LLP ("Dentons") and Loeb & Loeb LLP ("Loeb") in violation of the Court's December 6, 2013 Order for Permanent Injunction (ECF No. 883);

IT APPEARING TO THE COURT that Rowe has further violated the December 6, 2013 Order by filing a "UCC Financing Statement" in the amount of five hundred million dollars (\$500,000,000) against William Morris Endeavor Entertainment LLC ("WME"), successor-in-interest to Defendant William Morris Agency Inc., with the Clerk of Court, DeKalb County, Georgia, on or about February 14, 2014 (Letter from Tal E. Dickstein, Feb. 19, 2014), which filing Rowe transmitted by email to WME and others on February 18, 2014;

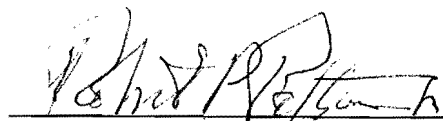
IT IS HEREBY ORDERED that the UCC Financing Statement filed by Rowe with the Clerk of the Superior Court of DeKalb County, Georgia, on or about February 14, 2014, naming WME as a "Lien Debtor" for a debt claimed by Rowe, is deemed null and void and ordered

expunged as expeditiously as possible from the records of any county clerks' offices or the records of any clerks of courts in which it has been filed or is hereafter filed; and

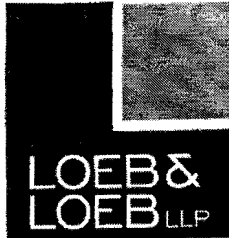
IT IS FURTHER HEREBY ORDERED that all liens, affidavits, financing statements, UCC financing statements, security agreements, finance agreements, other instruments and other documents filed or hereafter filed by Rowe, his agents, servants, employees, attorneys, or other persons in active concert and participation with Rowe, in any state or federal court, or in the public records of any state, county, or municipality, that purport to attach, encumber or otherwise affect the property or assets of WME, Loeb, and/or any of WME's or Loeb's current or former directors, officers, members, partners, employees, attorneys, agents or affiliates, including without limitation Michael P. Zweig, Helen Gavaris, Michael Beck, Christian D. Carbone, Tal E. Dickstein or Michael Barnett, are deemed null and void and of no effect *ab initio*, and ordered expunged as expeditiously as possible from the records of any county clerk's offices or the records of any clerks of courts in which they have been filed or are hereafter filed.

SO ORDERED.

Dated: New York, New York
February 19, 2014



Robert P. Patterson, Jr., U.S.D.J.



TAL DICKSTEIN
Senior Counsel

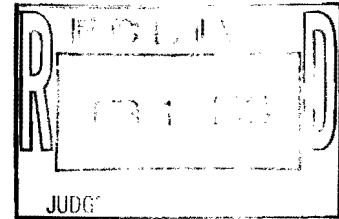
345 Park Avenue
New York, NY 10154

Direct 212.407.4963
Main 212.407.4000
Fax 646.924.3956
tdickstein@loeb.com

Via ECF and Email

February 19, 2014

Hon. Robert P. Patterson, Jr.
United States District Court
500 Pearl Street
New York, NY 10007



Re: Rowe Entertainment, et al. v. The William Morris Agency, et al., Case No. 98 Civ. 8272
(RPP) (S.D.N.Y.)

Dear Judge Patterson:

We represent William Morris Endeavor Entertainment, LLC ("WME"), successor-in-interest to Defendant William Morris Agency Inc. We write to advise the Court that we learned yesterday evening that a "UCC Financing Statement" in the amount of five hundred million dollars (\$500,000,000) was filed against WME with the Clerk of Court, Dekalb County, Georgia, on February 14, 2014 by Leonard Rowe. A copy is attached. Rowe's email to WME's co-CEO transmitting the lien states that that "[t]hese liens along with exhibits will also be filed in various other cities throughout America and selective countries around the world" and "will also be advertised and reported to all major credit agencies and bureaus." Rowe also transmitted this fraudulent lien with the foregoing email to IMG Worldwide, an entity that is currently the subject of a prospective acquisition by WME, and to an investment firm, Silver Lake Partners.

In view of these developments, we ask that the Court supplement its February 18 Order Finding Leonard Rowe in Contempt of Court to include Rowe's most recent lien filing as an additional act of contempt, and to provide that any other liens filed or hereafter filed by Rowe against WME or Loeb, or any of their attorneys or agents, be deemed null and void and ordered expunged. This supplemental order may avoid the need for further applications to the Court in order to expunge any later-discovered liens that Rowe has filed, or in the future files, "in various other cities throughout America[.]" For the Court's convenience, we have attached a Proposed Supplemental Order. We note that the proposed language largely tracks the Court's December 6, 2013 Permanent Injunction Order (Dkt. No. 883 at 4).

We are available at the Court's convenience to provide any additional information that may be required in addressing this application.



Hon. Robert P. Patterson, Jr.
February 19, 2014
Page 2

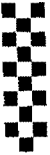
Respectfully yours,

A handwritten signature in black ink, appearing to read "Tal Dickstein".

Tal Dickstein
Senior Counsel

Attachments

cc: Leonard Rowe (via FedEx and Email)



*Rowe
Entertainment, Inc.*

FAX TRANSMISSION

To: Michael Dolan
Company: I M G
Fax Number: 646-558-8399
Phone Number: 212-489-8300
Number of Pages: _____
From: Leonard Rowe
Message: _____

5825 Glenridge Drive
Building 2, Suite 214
Atlanta, GA 30328
~~404-374-5253~~
~~(404) 303-7760 Phone~~
~~(404) 459-0908 Fax~~

CC,- Chuck Bennett
Michel Masquelier
George Payne

CC- Silver Lake Partners

Subj: **UCC-1 and Commercial Liens filed against William Morris Endeavor Part 1**
Date: 2/15/2014 11:39:58 A.M. Eastern Standard Time
From: RoweEntertain@aol.com
To: aemmanuel@wmeentertainment.com

These liens and exhibits have been filed against WME for their participation in the fraud, conspiracy, and corruption that took place against African Americans in the landmark civil rights case, Rowe Entertainment vs. The William Morris Agency (98-CIV-8272). These liens along with exhibits will also be filed in various other cities throughout America and selective countries around the world. They will also be advertised and reported to all major credit agencies and bureaus.

FILED

044 2014 00558 2014 FEB 14 AM 10:12

CLERK OF SUPERIOR COURT
DEKALB COUNTY GA

UCC FINANCING STATEMENT

FOLLOW INSTRUCTIONS

A. NAME & PHONE OF CONTACT AT FILER (optional) Leonard Rowe, 404-374-5253	LT # YEAR UCC#
B. E-MAIL CONTACT AT FILER (optional) roweentertain@aol.com	
C. SEND ACKNOWLEDGMENT TO: (Name and Address) William Morris Endeavor Entertainment 9601 Wilshire Boulevard Beverly Hills, CA 90210	

THE ABOVE SPACE IS FOR FILING OFFICE USE ONLY

1. DEBTOR'S NAME: Provide only one Debtor name (1a or 1b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); If any part of the individual Debtor's name will not fit in line 1b, leave all of item 1 blank, check here ☐ and provide the individual Debtor information in item 10 of the Financing Statement Addendum (Form UCC1Ad)

1a. ORGANIZATION'S NAME William Morris Endeavor Entertainment				
OR	1b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX
1c. MAILING ADDRESS 9601 Wilshire Boulevard		CITY Beverly Hills	STATE CA	POSTAL CODE 90210
			COUNTRY USA	

2. DEBTOR'S NAME: Provide only one Debtor name (2a or 2b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); If any part of the individual Debtor's name will not fit in line 2b, leave all of item 2 blank, check here ☐ and provide the individual Debtor information in item 10 of the Financing Statement Addendum (Form UCC1Ad)

2a. ORGANIZATION'S NAME William Morris Endeavor Entertainment				
OR	2b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX
2c. MAILING ADDRESS 1325 Avenue of the Americas		CITY New York	STATE NY	POSTAL CODE 10019
			COUNTRY USA	

3. SECURED PARTY'S NAME (or NAME of ASSIGNEE of ASSIGNOR SECURED PARTY): Provide only one Secured Party name (3a or 3b)

3a. ORGANIZATION'S NAME				
OR	3b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX
		Rowe	Leonard	
3c. MAILING ADDRESS 5805 States Bridge Rd. Suite #119		CITY Johns Creek	STATE GA	POSTAL CODE 30097
			COUNTRY USA	

4. COLLATERAL: This financing statement covers the following collateral:

This lien is filed for engaging in fraud and conspiracy, violation of LIEN CLAIMANT'S civil rights, the theft and concealment of lien claimant's property, illegal tampering with evidence in a federal proceeding, and numerous other crimes and offenses cited in LIEN CLAIMANT'S COMMERCIAL AFFIDAVIT. This CLAIM OF LIEN against the LIEN DEBTOR is in the amount of five hundred million dollars (\$500,000,000 US). This is the amount of damages enumerated in LIEN CLAIMANT'S UNREBUTTED AFFIDAVIT.

FIVE HUNDRED MILLION DOLLAR (\$500,000,000 U.S.) LIEN

See claimant's unrebutted affidavit

COPY

5. Check only if applicable and check only one box: Collateral is <input type="checkbox"/> held in a Trust (see UCC1Ad, item 17 and instructions) <input type="checkbox"/> being administered by a Decedent's Personal Representative	
6a. Check only if applicable and check only one box: <input type="checkbox"/> Public-Finance Transaction <input type="checkbox"/> Manufactured-Home Transaction <input type="checkbox"/> A Debtor is a Transmitting Utility	
6b. Check only if applicable and check only one box: <input type="checkbox"/> Agricultural Lien <input type="checkbox"/> Non-UCC Filing	
7. ALTERNATIVE DESIGNATION (if applicable): <input type="checkbox"/> Lessee/Lessor <input type="checkbox"/> Consignor/Consignee <input type="checkbox"/> Seller/Buyer <input type="checkbox"/> Bailor/Borrower <input type="checkbox"/> Licensee/Licensee	
8. OPTIONAL FILER REFERENCE DATA:	

Commercial Lien and Affidavit

RECORDING REQUESTED BY 044 2014 00558

Leonard Rowe

CTY# YEAR UCC#

FILED
2014 FEB 14 AM 10:12
CLERK OF SUPERIOR COURT
DEKALB COUNTY GA

WHEN RECORDED MAIL TO:

William Morris Endeavor Entertainment
9601 Wilshire Boulevard
Beverly Hills, CA 90210

William Morris Endeavor Entertainment
1325 Avenue of the Americas
New York, NY 10019

CLAIM OF LIEN

A Security (15 USC) Claim of COMMERCIAL LIEN AND AFFIDAVIT.

THIS IS NOT A LIS PENDENS LIEN.

It may not be removed or dissolved by any parties except the LIEN CLAIMANT or a jury of 12 properly convened and used.

This CLAIM OF LIEN is filed for the violation of state and federal laws. Damages have been substantially sustained due to theft of property, fraud, and conspiracy.

A COMMERCIAL AFFIDAVIT sworn true, correct, and complete was sent by LIEN CLAIMANT (Leonard Rowe) to LIEN DEBTOR (William Morris Endeavor Entertainment) on January 8, 2014 by email and United States Postal Service, Certified Mail, Return Receipt Requested. LIEN DEBTOR (William Morris Endeavor Entertainment) failed to respond to AFFIDAVIT OF NOTICE thereby admitting and acquiescing to declarations by LIEN CLAIMANT (Leonard Rowe). A NOTICE OF DEFAULT was served upon them on January 21, 2014 by United States Postal Service, Certified Mail, Return Receipt Requested. Such default admits that the LIEN CLAIMANT (Leonard Rowe) claims are true and that LIEN DEBTOR (William Morris Endeavor Entertainment) is guilty of the criminal and ethical violations as set forth in LIEN CLAIMANT'S COMMERCIAL AFFIDAVIT and NOTICE OF DEFAULT.

In the absence of a response, when the LIEN DEBTOR was given an opportunity to respond, the LIEN CLAIMANT hereby inserts and records this CLAIM OF LIEN against the LIEN DEBTOR in the total amount of five hundred million dollars (\$500,000,000 US). Said CLAIM OF LIEN is in the amount of damages enumerated in LIEN CLAIMANT'S UNREBUTTED COMMERCIAL AFFIDAVIT.

This COMMERCIAL LIEN is filed to command specific performance of LIEN DEBTOR and to impound their properties and assets for claims, for engaging in fraud and conspiracy, violation of LIEN CLAIMANT'S civil rights, the theft and concealment of LIEN CLAIMANT'S property, illegal tampering with evidence in a federal proceeding, and numerous other crimes and offenses cited in LIEN CLAIMANT'S COMMERCIAL AFFIDAVIT, in which all was done to defraud the LIEN CLAIMANT, to enrich themselves.

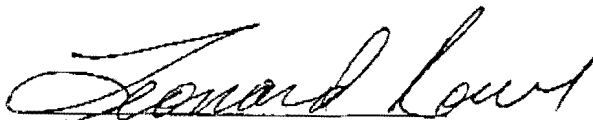
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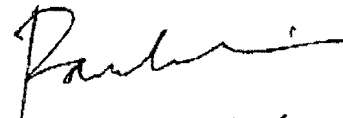
The LIEN DEBTOR is liened for a minimum of five hundred million dollars based on Title 18, Section 241, of the United States code for violation of United States Constitutional Rights including the Seventh Amendment of the Bill of Rights, guaranteeing a jury trial in all commercial processes and many other commercial provisions of the United States Constitution. All processes in the above-cited case have been summary processes in which the constitutional and commercial right to a jury trial has been abridged and denied.

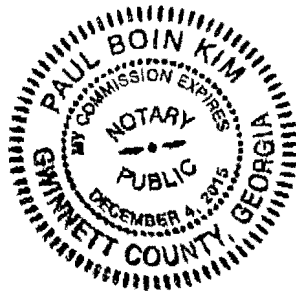
This COMMERCIAL LIEN is intended to notify, through recording, that all bank accounts, real and moveable property of the aforementioned LIEN DEBTOR can be seized from the cited LIEN DEBTOR until the total amount of lien is satisfied.

Leonard Rowe being duly sworn says: I am the claimant, I have read the foregoing claim and know the contents thereof, is true, correct, and just.

I respectfully submit this day of 2/11/2014.


Leonard Rowe


2/11/14



044 2014 00558
CTY# YEAR UCC#

FILED
2014 FEB 14 AM 10:12
CLERK OF SUPERIOR COURT
DEKALB COUNTY GA

COPY

*Rowe
Entertainment, Inc.*

FAX TRANSMISSION

To: Glenn H. Hutchins
Company: Silver Lake Partners
Fax Number: 212-981-3535
Phone Number: _____
Number of Pages: _____
From: Leonard Rowe
Message: Please cc:
1. David J. Roux
2. Gregory K. Mendre
3. Audie Paterna
4. James A. Davidson
CC: Michael Dolan IMG

5825 Glenridge Drive
Building 2, Suite 214
Atlanta, GA 30328
(404) ³⁷⁴⁻¹⁵⁷⁰ 363-7700 Phone
(404) 459-0908 Fax

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To: aemanuel@wmeentertainment.com

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Leonard Rowe

CTY# YEAR UCC#

FILED
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CLERK OF SUPERIOR COURT
BERKELEY COUNTY GA

WHEN RECORDED MAIL TO:

William Morris Endeavor Entertainment
9601 Wilshire Boulevard
Beverly Hills, CA 90210

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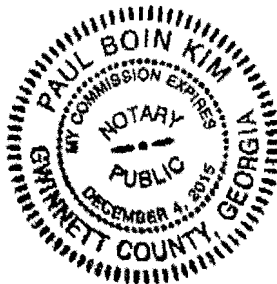
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Leonard Rowe


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WINNETT COUNTY, GEORGIA

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